

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

KAREN DI PIAZZA, Individually and as §
Mother to CORBIN JAEGER and as Personal §
Representative of the Estate of CORBIN LEE §
JAEGER, Deceased, §

Plaintiff, §

v. §

WEATHER GROUP TELEVISION, LLC §
dba THE WEATHER CHANNEL, et al. §

Defendants. §

Civil No. 5:19-cv-0060-C

**DEFENDANT KEITH DANIELS, AS PERSONAL REPRESENTATIVE OF THE
ESTATE OF RANDALL D. YARNALL'S EXPERT DISCLOSURES UNDER
RULE 26(a)(2) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Defendant Keith Daniels, as Personal Representative of the Estate of Randall D. Yarnall, makes the following expert disclosures:

26(a)(2)(C) Witnesses Who Do Not Provide a Written Report:

The following are persons that are likely to have information that Defendant may use to support its defenses in this case:

Agents and/or employees of the Texas Department of Public Safety, including but not limited to the following:

Trooper Nathaniel Washburn

Trooper Jerry Johnson

Corporal Roger Medrano

Trooper Frank Mosher

Trooper Andrew Wilson

215 S. Berkshire

Crosbyton, TX 79322

(806) 675-2131

Agents and/or employees of Dickens County Sheriff's Office, including but not limited to the following:

Sheriff Terry Braly
Deputy Jay Allen
819 5th St.
Dickens, TX 79229
(806) 623-5533

These law enforcement officers are expected to testify with regard to the facts and circumstances contained in the police report and DPS investigation file regarding the subject automobile accident. Whether they are qualified to render expert opinions or accident reconstruction and causation is unknown and this designation is not an agreement or waiver of the Defendant's right to object to any such opinion testimony.

Agents and/or employees of Dickens County EMS, including but not limited to the following:

Debi Gardner, EMT-P
Becky Rodriguez
Romero Rodriguez
Spur, TX 79229
(806) 271-4838

Agents and/or employees of Spur Volunteer Fire Department, including but not limited to the following:

Chief Reid Arnold
Andrew Adams
Feliciano Carothers
Cole Clark
Max Haney
Taffy Lee
Rick Paschall
Ronald Todd
100 S. Burlington
Spur, TX 79370

Agents and/or employees of McAdoo Volunteer Fire Department, including but not limited to the following:

Chief Mack Gardner
Bill Berry
James Edinburgh
Russ Edinburgh
Mack Gardener
Josh Tanner
103 N. Main St.
McAdoo, TX 79243

Nancy Stone
Dickens County Justice of the Peace
512 Montgomery St.
Dickens, TX 79229
(806) 623-5233

Agents and/or employees of Texas Department of Transportation, Traffic Control, including but not limited to the following:

Kenneth Cornett
Joshua Allen
Eric Jernigan
Bobby Kautz
Randy Martin
David Wallace
Brendale Wilbern
411 E. Hwy 82
Dickens, TX 79229
(806) 623-5241

These emergency personnel are expected to testify with regard to the facts and circumstances contained in the police report and DPS investigation file regarding the subject automobile accident. Whether they are qualified to render expert opinions or accident reconstruction and causation is unknown and this designation is not an agreement or waiver of the Defendant's right to object to any such opinion testimony.

Agents and/or employees of South Plains Forensic Pathology, including but not limited to the following:

Thomas R. Parsons, M.D.
P.O. Box 64813
Lubbock, TX 79464
(806) 790-9611

Dr. Parsons is expected to testify with regard to the opinions contained in the autopsy and toxicology reports.

Agents and/or employees of Weather Group Television, LLC d/b/a The Weather Channel, including but not limited to the following:

Dr. Greg Postel, Meteorologist
c/o Douglas D. Fletcher
Richard Miller
Gerardo E. Alcantara
Fletcher, Farley, Shipman & Salinas, LLP
9201 N. Central Expwy., Ste. 600
Dallas, TX 75231
(214) 987-9600

Dr. Postel will testify concerning the weather conditions on the day of the accident and the reason the storm chasers were in the field.

Respectfully submitted,

BY: /s/ Robert B. Wagstaff
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(325) 676-8836 Fax

ATTORNEYS FOR DEFENDANT
KEITH DANIELS, AS PERSONAL
REPRESENTATIVE OF THE ESTATE
OF RANDALL D. YARNALL

CERTIFICATE OF SERVICE

This is to certify that a true copy of the above and foregoing instrument was filed electronically with the Court's electronic filing system on this 6th day of October, 2020, in accordance with the Federal Rules of Civil Procedure and LR 5.1 of the Northern District of Texas.

/s/ Robert B. Wagstaff
Robert B. Wagstaff